

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION, CINCINNATI

William Engelman,	:	Case No. 1:06-cv-00223-MHW
Plaintiff,	:	District Judge Michael H. Watson
v.	:	
NITV Federal Services, LLC,	:	<b>REVISED RULE 26(f)</b>
Defendant.	:	<b>REPORT OF PARTIES</b>

Pursuant to Fed. R. Civ. P. 26(f), the parties held a phone conference on June 13, 2006. The following counsel participated:

Robert S. Kaiser, counsel for Plaintiff William Engelman  
Jamie Ramsey, counsel for Defendant NITV Federal Services, LLC

**1. Magistrate Consent.** The Parties do not unanimously consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

**2. Pre-Discovery Disclosures.** The parties have agreed to waive initial disclosures.

**3. Discovery Issues and Dates.** The parties propose the following:

**A. Subjects.** Discovery will necessary on the following subjects:

- (1) terms and alleged breaches of the parties' contract;
- (2) truth/falsity of Defendant's statements regarding Plaintiff;
- (3) Plaintiff's claimed damages; and
- (4) Defendant's claimed damages.

**B. Phases of Discovery.** Discovery need not be bifurcated or limited.

**C. Dates.**

Date for disclosure and report of Plaintiff's expert(s): September 29, 2006

Date for disclosure and report of Defendant's expert(s): October 31, 2006

Date for disclosure and report of rebuttal expert(s): November 29, 2006

Date for disclosure of non-expert witnesses: January 2, 2007

Discovery Cutoff Date: February 16, 2007

**4. Discovery Limitations.** The parties jointly propose no changes to limitations under Fed. R. Civ. P.

**5. Other Matters:**

**A. Protective Order.** The parties do not anticipate a need for a protective order.

**B. Settlement.** A settlement demand has not been made. A response has not been made.

**C. Motion Deadlines.**

Deadline to amend the pleadings or add parties: closed

Deadline for motions relative to the pleadings: closed

Deadline for dispositive motions: February 28, 2007

**D. Pretrial Conference Dates.**

Recommended date for status conference (if any): none

Recommended date for final pretrial conference: at the Court's convenience

**E. Other matters pertinent to management of this litigation:** An issue may arise as to arrangements and locations for depositions. Defendant is located in Florida; Plaintiff is an Ohio resident currently working in Guantanamo Bay, Cuba. Counsel will cooperate and try to resolve any issues without the Court's involvement.

Signatures:

Attorney for Plaintiff

Attorneys for Defendant

/s/ Robert S. Kaiser  
Robert S. Kaiser  
Bar # 0039364

/s/ Jamie M. Ramsey  
Jamie M. Ramsey  
Bar # 0071369